

COMMENTS IN RESPONSE TO FCC NOTICE OF PROPOSED RULEMAKING REEMERGENCY ALERT SYSTEM, EB Docket No. 04-296

1. These comments have been approved for filing with the FCC by majority

vote of the Santa Clara County Emergency Managers Association at its 16 September 2004 meeting and represent the views of its members which include the County of Santa Clara, all cities in that county and those special districts which are SCCEMA members.

2. This NPRM seeks comments regarding whether and how best to improve the Emergency Alert System. It acknowledges input from the Media Security

and Reliability Council and the Partnership for Public Warning. Both MSRC and PPW recommend upgrading and not replacing EAS. Further, PPW recommends that any improved system build on existing EAS infrastructure.

In preparing these comments, detailed recommendations from MSRC and PPW were not available for review.

3. One, any improvement to EAS should increase coverage by an order of magnitude or more within the shortest possible timeframe.

3a. The NPRM points out that a low percentage of the population is typically listening to analog radio or watching analog television (over-the-air or via cable).

3b. Emerging digital broadcasters are not required to install EAS equipment.

3c. Except for Presidential messages, EAS is voluntary. State or local messages may not be carried.

3d. A 10X increase in coverage is not an unreasonable goal and may include multiple pathways to target populations.

3e. Any improvement should be accomplished in a few years, not a decade.

4. Two, any improved EAS must be simple to operate, using or minimally expanding upon existing training and operational competence.

4a. Operational competence is marginal today owing to limited understanding of EAS capabilities, hardware complexity, training retention and staff turnover.

4b. A basic principle for infrequently used emergency systems is that they should utilize user interfaces similar to commonly used software or Internet browsers.

5. Three, any improvement to EAS must be no or low cost to state and local governments in terms of hardware, installation and training.

5a. Existing EAS gateway hardware should continue to operate in any

improved
system.

5b. Existing computers, telephones and other commonly available instruments should provide gateway access to an improved EAS.

6. The task of creating specific recommendations regarding the nature of and transition to an improved EAS should be assigned to a group representing emergency management and the broadcast industry. Their recommendations should be consistent with these three basic principles.

George Washburn
Emergency Services Coordinator
Milpitas Fire Dept. Office of Emergency Services
(408) 586-2804

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04-296
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Emergency
Services
<ADDRESS2> 777 S. Main Street
<CITY>
Milpitas
<STATE> CA
<ZIP>
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408-586-2804
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<CONTACT-EMAIL> gwashburn@ci.milpitas.ca.gov

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